



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director
(804) 698-4000

June 16, 2020

VIA ELECTRONIC MAIL

Mr. Jody Hawks
Environmental Manager
BAE Systems, Ordnance Systems, Inc.
Radford Army Ammunition Plant
4050 Pepper's Ferry Road
Radford, Virginia 24141

**Re: Multi-Pathway Risk Assessment Report
Submission Schedule for the Part B Permit Application for the Renewal of the
Hazardous Waste Subpart O Explosive Waste Incinerator Permit – Extension
Request Approval
Radford Army Ammunition Plant (RAAP), Radford, Virginia
EPA ID#: VA1210020730**

Dear Mr. Hawks:

The Virginia Department of Environmental Quality's Office of Financial Responsibility and Waste Programs (DEQ) received your request, dated May 26, 2020, via electronic mail on June 4, 2020 for a 90 day extension to the Radford Army Ammunition Plant's (RAAP) Radford Army Ammunition Plant (RAAP) facility's *Timeline of the Multi-Pathway Risk Assessment for the Energetic Waste Incinerator Permit for the Storage and Treatment of Hazardous Waste* (EWI MPRA Timeline) which was approved by DEQ on August 14, 2019 and received on August 13, 2019. The extension request for the EWI MPRA Timeline was submitted to allow for additional time to complete the approved EWI MPRA Timeline due to the DEQ review and approval of the Air Modeling Alternate Receptor Memo submitted on April 9, 2020 and approved by DEQ on May 20, 2020.

DEQ acknowledges that the review of the Air Modeling Alternate Receptor Memo will have an impact on the timeline but also reminds the RAAP facility that the Air Modeling Report was approved on February 18, 2020, within the 60 day review established by the EWI MPRA

Mr. Jody Hawks

Page 2

June 16, 2020

Timeline and the Air Modeling Alternate Receptor Memo was not submitted to DEQ for review until 51 days after approval was granted, which was not in accordance with the EWI MPRA Timeline.

The extension request has been approved, but not for the full 90 days. DEQ is approving a 45 day extension to the EWI MPRA Timeline based off of the 41 days DEQ took to approve the Air Modeling Alternate Receptor Memo. The new due date for the EWI MPRA is now September 21, 2020.

If you have any questions concerning the information provided in this letter, please contact me at (804) 698-4467 or by email at Ashby.Scott@deq.virginia.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ashby R. Scott', written in a cursive style.

Ashby R. Scott
Hazardous Waste Permit Writer
Office of Financial Responsibility and Waste
Programs

cc: Central Hazardous Waste Files
Mindy Lemoine, EPA, Region III (3LC50)
Nikki Herschler, Rebecca Wright, DEQ BRRO
Leslie Romanchik, Kyle Newman, Brian Burton, DEQ, CO

Jim McKenna, Radford Army Ammunition Plant